

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

JAMAR ANTWAUN GLADDEN,

*Plaintiff,*

v.

Civil Action No. **3:19CV00009**

R.A. OBERHOLZER,

*Defendant.*

**ANSWER OF DEFENDANT R.A. OBERHOLZER**

Defendant R.A. Oberholzer, by counsel, submits his Answer to Plaintiff's Complaint, as follows:

1. Defendant denies the allegations in paragraph III-Statement of Claim in the Complaint.
2. Defendant denies that he placed Plaintiff in a choke hold on July 29, 2015 and denies that he used excessive force during Plaintiff's arrest/detention on July 29, 2015.
3. Defendant denies all allegations in the Complaint not expressly admitted herein.
4. Defendant denies that he is indebted or liable to the plaintiff for the amounts or reasons set forth in the Complaint or any other amount or reasons whatsoever.
5. The Complaint fails to state a claim upon which relief can be granted.
6. Defendant is entitled to qualified immunity.
7. The Complaint is barred by the statute of limitations.

Wherefore, your defendant moves the Court to dismiss the Complaint and award him his costs in this behalf expended.

R.A. OBERHOLZER  
By Counsel

s/Richard H. Milnor

Richard H. Milnor, Esquire (VSB #14177)

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*Counsel for R.A. Oberholzer*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 5<sup>th</sup> day of April, 2019, I electronically filed the foregoing Answer with the Clerk of the Court using the CM/ECF system, and mailed a copy of the Answer to:

Jamar Antwaun Gladden  
500 5<sup>th</sup> St. #B  
Waynesboro, VA 22980

s/Richard H. Milnor